

FILED 04 DEC 13 15:24 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNDER SEAL

UNITED STATES OF AMERICA

Case No. 3:13-cr-00570-HZ
INDICTMENT

v.

**JOSHUA RYAN SPARKS,
JAMIE WALTER COLEMAN JR.,
ANTHONY STAGGS, and
DEBRA ANN NAVARRO,**

**21 U.S.C. §§ 841(a)(1), 846
21 U.S.C. § 853
18 U.S.C. §§ 922(g)(1), 924(d)
28 U.S.C. § 2461(c)**

Defendants.

UNDER SEAL

THE GRAND JURY CHARGES:

**COUNT 1:
Conspiracy to Distribute Methamphetamine**

Between May 2013 and August 2013, in Multnomah County, within the District of Oregon, **JOSHUA RYAN SPARKS, JAMIE WALTER COLEMAN JR., ANTHONY STAGGS, and DEBRA ANN NAVARRO**, defendants herein, did knowingly and willfully combine, conspire, confederate and agree with each other and with others both known and unknown to the Grand Jury, to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

**COUNT 2:
Distribution of Methamphetamine**

On or about June 27, 2013, in Multnomah County, within the District of Oregon, defendant **JOSHUA RYAN SPARKS** did knowingly and intentionally distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States

Code, Section 841(a)(1). The Grand Jury further charges, pursuant to Title 21, United States Code, Section 841(b)(1)(B)(viii), that this violation involved 5 grams or more of actual (pure) methamphetamine.

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COUNT 3:

Possession with Intent to Distribute Methamphetamine

On or about ~~November~~ 21, 2013, in Multnomah County, within the District of Oregon, defendants **JAMIE WALTER COLEMAN JR. and DEBRA ANN NAVARRO**, did knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT 4:

Felon in Possession of a Firearm

On or about August 21, 2013, in Multnomah County, within the District of Oregon, defendant **JOSHUA RYAN SPARKS**, having been convicted of crimes punishable by imprisonment for a term exceeding one year, specifically:

- A. Possession of a Controlled Substance, on or about October 27, 2011, in the State of Oregon for Multnomah County Circuit Court, Case Number 11-10-34522;
- B. Felon in Possession of a Firearm, on or about April 14, 2008, in the United States District Court (Oregon), Case Number 07-CR-229-MO;
- C. Delivery/Manufacture of a Controlled Substance, on or about June 10, 2004, in the State of Oregon for Multnomah County Circuit Court, Case Number 03-03-31406;

did knowingly and unlawfully possess one or more of the following firearms, to-wit:

1. a Glock Model 19, 9mm caliber pistol, with serial number EH343US;

2. a Star (unknown model), 9mm caliber pistol, with serial number 1585507;
3. a Harrington and Richardson (H&R) (unknown model), .22 caliber revolver, with serial number 548347;

which had previously been transported in interstate commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 5:
Felon in Possession of a Firearm

On or about August 21, 2013, in Multnomah County, within the District of Oregon, defendant **ANTHONY STAGGS**, having been convicted of crimes punishable by imprisonment for a term exceeding one year, specifically:

- A. Felony Attempt to Elude, on or about April 24, 2013, in the State of Oregon for Multnomah County Circuit Court, Case No. 13-03-31067;
- B. Unauthorized Use of a Motor Vehicle, on or about March 17, 2011, in the State of Oregon for Multnomah County Circuit Court, Case No.10-10-33982;
- C. Unlawful Possession of Methamphetamine, on or about August 10, 2010, in the State of Oregon for Multnomah County Circuit Court, Case No.10-06-32464;
- D. Burglary I, on or about November 12, 2002, in the State of Oregon for Multnomah County Circuit Court, Case No. 02-07-34039;
- E. Burglary I, on or about September 27, 1990, in the State of Oregon for Multnomah County Circuit Court, Case No. 89-12-36898; and
- F. Burglary I, on or about July 20, 1989, in the State of Oregon for Marion County Circuit Court, Case No. 89C20897;

did knowingly and unlawfully possess one or more of the following firearms, to-wit:

1. a Taurus Model PT 740, .40 caliber pistol, with serial number 1585507;
2. a North American Arms, Model NAA, .22 caliber revolver, with serial number V49287;

which had previously been transported in interstate commerce, all in violation of Title 18, United States Code, Section 922(g)(1).

CRIMINAL FORFEITURE -DRUG OFFENSE

As a result of committing the controlled substance offenses alleged in Counts 1-3 of this indictment, **JOSHUA RYAN SPARKS, JAMIE WALTER COLEMAN JR., ANTHONY STAGGS, and DEBRA ANN NAVARRO**, defendants herein, shall forfeit to the United States pursuant to Title 21 United States Code, Section 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations.

CRIMINAL FORFEITURE ALLEGATION - FIREARMS

Upon conviction of the offense alleged in Counts 4 or 5 of this indictment, defendants **JOSHUA RYAN SPARKS and ANTHONY STAGGS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), the firearms and all associated ammunition involved in that offense, including without limitation:

1. a Glock Model 19, 9mm caliber pistol, with serial number EH343US;
2. a Star (unknown model), 9mm caliber pistol, with serial number 1585507;

3. a Harrington and Richardson (H&R) (unknown model), .22 caliber revolver, with serial number 548347;
4. a Taurus Model PT 740, .40 caliber pistol, with serial number 1585507;
5. a North American Arms, Model NAA, .22 caliber revolver, with serial number V49287;

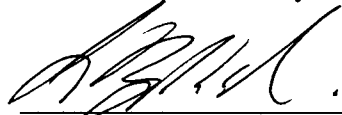
DATED this 4th day of December 2013.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney



LEAH K. BOLSTAD, OSB #052039
Assistant United States Attorney